

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE

ROCKWOOD SELECT ASSET FUND XI, )  
(6)-1, LLC, )  
Plaintiff )  
v. )  
DEVINE, MILLIMET & BRANCH, PA and )  
KAREN S. MCGINLEY, ESQ., )  
Defendants )

Docket No. 1:14-cv-00303-JL

PLAINTIFF'S ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY  
OR SURREPLY TO DEFENDANTS' OBJECTION TO  
PLAINTIFF'S MOTION TO UNSEAL THE PROPOSED AMENDED COMPLAINT

Plaintiff, Rockwood Select Asset Fund XI, (6)-1, LLC, by its attorneys, Gravel & Shea PC, hereby moves for leave to file a reply or surreply to Defendant's Objection to Plaintiff's Motion to Unseal the Proposed Amended Complaint. In support of its motion, Plaintiff states as follows:

1. Due to the timing of Defendants' Motion for Protective Order, Plaintiff was not able to respond to the issues raised by the Motion until after the Court granted Defendants' request to seal on November 19, 2015. Plaintiff filed an Opposition to Motion to Seal on December 2, 2015.
2. On December 15, Defendants submitted a filing titled Objection to Plaintiff's Motion to Unseal the Proposed Amended Complaint, which raises new issues to which Plaintiff must respond.

3. Plaintiff accordingly requests leave to file a response of up to five pages to Defendants' Objection.

4. As they stated in their Objection, Defendants do not object to allowing Plaintiff to file a responsive pleading, whether it is properly described as a reply or a surreply.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

- a. Grant Plaintiff's Motion for Leave to File a Reply or Surreply to Defendant's Objection.
- b. Grant such other and further relief as this Honorable Court may deem just and equitable.

Dated: Burlington, Vermont  
December 18, 2015

/s/ David A. Boyd

Robert F. O'Neill, Esq.

David A. Boyd, Esq.

Gravel & Shea PC

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For Plaintiff

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CERTIFICATE OF SERVICE

I, David A. Boyd, Esq., attorney for Plaintiff, certify that on December 18, 2015, I served a copy of Plaintiff's Assented-To Motion for Leave to File Reply or Surreply to Defendants' Objection to Plaintiff's Motion to Unseal the Proposed Amended Complaint, through the CM/ECF system on the following individuals:

James C. Wheat, Esq.  
jwheat@wadleighlaw.com

Pierre A. Chabot, Esq.  
pchabot@wadleighlaw.com

Dated: Burlington, Vermont  
December 18, 2015

/s/ David A. Boyd

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